

EXHIBIT D

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Washington, DC 20036



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A LIMITED LIABILITY PARTNERSHIP

August 31, 2022

CONFIDENTIAL TREATMENT REQUESTED

BY EMAIL

David Schwartz, Esq.
United States Federal Trade Commission
Bureau of Competition
Technology Enforcement Division
400 7th Street, SW
dschwartz1@ftc.gov

Re: Amazon.com, Inc., FTC File Nos. 191-0129 & 191-0130

Dear David:

We appreciate your willingness to accept Amazon's proposal to respond to the Commission's August 9, 2022 subpoena with a written submission and a document production of responsive policies, in addition to the Commission's in-person review of the hard copies of certain Signal screenshots. Amazon remains committed to cooperating with the Commission and Staff regarding the August 9, 2022 subpoena. Amazon hopes that this submission, combined with Staff's *in camera* review of screenshots of the asterisked Signal threads identified in the updated Appendix A of Amazon's August 29, 2022 letter (the "Signal log") (i.e., threads where the disappearing message feature was enabled at any time during the thread), will address your concerns. This submission is provided consistent with our proposal for specifications 1–9.

In particular, we provide with this submission the following policies identified to date that are responsive to specifications 1–5. If we identify any other responsive policies we will supplement this disclosure promptly.

- Enclosure A, Amazon U.S. Owner's Manual and Guide to Employment (last edited July 29, 2022) in response to specifications 1, 2, and 3;
- Enclosure B, Mobile Phones and Tablets Standard (last published November 9, 2021) in response to Specifications 1 and 2;
- Enclosure C, one of Amazon's Third-Party Software Policies (last published April 29, 2022) in response to specifications 2 and 3;
- Enclosure D, another Third-Party Software Policy (last modified 1 year ago) in response to specifications 2 and 3;
- Enclosure E, Laptop and Desktop Standard (last published August 5, 2022) in response to specification 3;
- Enclosure F, Amazon's Secure Communication Policy (last published March 22, 2022) in response to specifications 4 and 5; and

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- Enclosure G, Amazon's Policy on Document and Record Retention and Destruction (last revised August 18, 2022) in response to specification 5.

In addition, Amazon has issued legal guidance that specifically addresses the use of Signal. Amazon is not producing those legal guidance documents in order to maintain privilege and avoid effecting a privilege waiver, but identifies them in a privilege log accompanying this response.

Our written submissions for specifications 6–9 are provided below. Amazon is providing the below written responses and the documents produced with this submission without waiving any privileges, protections, or immunities, including, without limitation, the attorney-client privilege, work product protection, and any other applicable privileges or protections.

Best regards,

A handwritten signature in blue ink, appearing to read "Beth G. Wilkinson", followed by a horizontal line.

Beth Wilkinson

Confidential Treatment Requested**Amazon's Written Submissions to Specifications 6–9**

***Spec. 6:** All recipients of any document preservation notices and refresh document preservation notices sent by the Company in connection with the Investigation, as well as the timing of any document preservation and refresh notices sent by the Company in connection with the Investigation.*

After Amazon received the Commission's June 2019 notice letter, document preservation notices were sent to Amazon personnel that Amazon believed may have information responsive to the FTC's voluntary request. Following issuance of the Commission's Civil Investigative Demand in February 2020, Amazon sent document preservation notices to additional personnel who Amazon viewed as potential Investigation custodians based on early discussions with FTC staff. After lengthy negotiations surrounding the scope of the CID in Spring and Summer of 2020, Amazon issued an additional notice in June 2020, expanding both the scope of document preservation obligations and the recipient list. Amazon continued to issue additional notices based on evolving custodian negotiations with FTC staff.

Amazon previously provided dates of the first document preservation notices for custodians who used Signal in its letter to the Commission on May 20, 2022. Below, Amazon lists below the recipients and dates of all formal document preservation notices issued in connection with the Investigation to Amazon personnel who served as Investigation custodians.¹

Table 1	
Custodian	Document Preservation Notice Dates
Aubrey, Colleen	July 2, 2019; March 19, 2020; June 4, 2020
Bajari, Pat	July 2, 2019; March 19, 2020; June 4, 2020
Baker, Adam	July 2, 2019; March 19, 2020; June 4, 2020
Bangs, Jonathan	March 19, 2020; June 4, 2020
Beauchamp, Christine	July 2, 2019; March 19, 2020; June 4, 2020
Bennett, Lindell Lee	June 4, 2020
Berns, Adam	March 19, 2020; June 4, 2020
Bezos, Jeff	April 13, 2020
Blackburn, Jeff	July 2, 2019; March 19, 2020; June 4, 2020
Bozeman, Dave	July 2, 2019; March 19, 2020; June 4, 2020
Cardadeiro, David	June 4, 2020
Carter, Jeff	March 19, 2020; June 4, 2020
Chand, Natasha	July 2, 2019; March 19, 2020; June 4, 2020
Chopra, Rajiv	July 2, 2019; March 19, 2020; June 4, 2020
Clark, Dave	July 2, 2019; March 19, 2020; June 4, 2020
Coleman, Janette	June 4, 2020
Collins, Timothy	July 2, 2019; March 19, 2020; June 4, 2020
Connors, John	June 4, 2020
Copeland, Jack Patrick	July 2, 2019; March 19, 2020; June 4, 2020

¹ Custodians listed in the September 29, 2020 Final Production Schedule, but not included in this chart, were no longer Amazon employees when formal document preservation notices were sent.

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Daniel, Miriam	June 4, 2020
Delingat, Marc	June 4, 2020
Denissen, Nick	July 2, 2019; March 19, 2020; June 4, 2020
Despins, Paula	June 4, 2020
Downer, Steve	July 2, 2019; March 19, 2020; June 4, 2020
Elton, Tanner Jon	March 19, 2020; June 4, 2020
Farrell, Corey	June 4, 2020
Felton, John	July 2, 2019; March 19, 2020; June 4, 2020
Fincham, Tim	July 2, 2019; June 4, 2020
French, Eric	July 2, 2019; March 19, 2020; June 4, 2020
Fresko, Nedim	June 4, 2020
Gansert, Rebecca	June 4, 2020
Gao, Wei	July 2, 2019; March 19, 2020; June 4, 2020
Garg, Neeraj	June 4, 2020
George, Dave	June 4, 2020
Ghani, Jamil	July 2, 2019; March 19, 2020; June 4, 2020
Glenn, Christa Stephens	March 19, 2020; June 4, 2020
Grandinetti, Russ	July 2, 2019; March 19, 2020; June 4, 2020
Griffith, Mark Bowen	June 4, 2020
Gupta, Srishti	March 19, 2020; June 4, 2020
Hart, Greg	March 19, 2020; June 4, 2020
Helbling, Jeff	March 19, 2020; June 4, 2020
Henri, David	July 2, 2019; March 19, 2020; June 4, 2020
Herrington, Doug	July 2, 2019; March 19, 2020; June 4, 2020
Heyworth, Sam	March 19, 2020; June 4, 2020
Hopkins, Mike	March 19, 2020; June 4, 2020
Jain, Ravi	July 2, 2019; March 19, 2020; June 4, 2020
Jain, Sachin	July 2, 2019; March 19, 2020; June 4, 2020
Jassy, Andy	February 10, 2021
Kirk, Jon	March 19, 2020; June 4, 2020
Kniesel, Danica	March 19, 2020; June 4, 2020
Kotas, Paul	July 2, 2019; March 19, 2020; June 4, 2020
Krawiec, Peter	March 19, 2020; June 4, 2020
Landry, Stephenie	July 2, 2019; March 19, 2020; June 4, 2020
Lane, David	July 2, 2019; March 19, 2020; June 4, 2020
Larsen, Peter	March 19, 2020; June 4, 2020
Limp, Dave	March 19, 2020; June 4, 2020
Lindsay, Neil	July 2, 2019; March 19, 2020; June 4, 2020
Livesay, David	June 4, 2020
Love, John	July 2, 2019; March 19, 2020; June 4, 2020
Mason, Llew	July 2, 2019; March 19, 2020; June 4, 2020
Mathieson, Mike	March 19, 2020; June 4, 2020
McGinness, Tralee	March 19, 2020; June 4, 2020
McGuire, Laurie Brooks	June 4, 2020
Mehta, Dharmesh	July 2, 2019; March 19, 2020; June 4, 2020

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Mishra, Devesh	July 2, 2019; March 19, 2020; June 4, 2020
Moore, Chuck	July 2, 2019; March 19, 2020; June 4, 2020
Naggar, David	July 2, 2019; March 19, 2020; June 4, 2020
Nahon, Jean-Luc	July 2, 2019; March 19, 2020; June 4, 2020
Nidamarthi, Lakshmi	August 14, 2020
Olsavsky, Brian	March 19, 2020; June 4, 2020
Patrick, Piper	March 19, 2020; June 4, 2020
Perez-Tenessa, Alex	June 4, 2020
Phillips, Roberts	June 4, 2020
Pulciani, Rob	June 4, 2020
Rabuchin, Steve	March 19, 2020; June 4, 2020
Roth, Mike	July 2, 2019; March 19, 2020; June 4, 2020
Rubenson, Aaron	June 4, 2020
Salomon, Shelley	July 2, 2019; March 19, 2020; June 4, 2020
Santana-Alvarez, Barbara	June 4, 2020
Shure, Steve	July 2, 2019; March 19, 2020; June 4, 2020
Sibay, Cem	July 2, 2019; March 19, 2020; June 4, 2020
Signorelli, Sharon	June 4, 2020
Simpson, Ian	July 2, 2019; March 19, 2020; June 4, 2020
Spoonmore, Brenda	March 19, 2020; June 4, 2020
St. Angel, Lindo	March 19, 2020; June 4, 2020
Stites, Robert	March 19, 2020; June 4, 2020
Taddy, Matt	July 2, 2019; March 19, 2020; June 4, 2020
Taylor, Tom	March 19, 2020; June 4, 2020
Thirumalai, Srikanth	July 2, 2019; March 19, 2020; June 4, 2020
Tundrea, Emanuella	June 4, 2020
Weiland, Thomas	July 2, 2019; March 19, 2020; June 4, 2020
Weldele, Tobin	July 2, 2019; March 19, 2020; June 4, 2020
Wilke, Jeff	July 2, 2019; March 19, 2020; June 4, 2020
Williams, Lisa Amelia	March 19, 2020; June 4, 2020
Witham, John	July 2, 2019; March 19, 2020; June 4, 2020
Wood, Sarah	July 2, 2019; March 19, 2020; June 4, 2020

In addition, Amazon lists below the recipients of all formal document preservation notices issued in connection with the Investigation to other Amazon personnel (i.e., those who did not end up serving as Investigation custodians), as well as the first date those personnel received a formal notice in connection with the Investigation.

Table 2			
Employee	Document Preservation Notice	Employee	Document Preservation Notice
Adkins, Jim	July 2, 2019	Leslie, Phil	March 19, 2020
Alibhai, Ashiana	June 4, 2020	Levkiv, Carly	June 4, 2020
Araiza, Kyle	June 4, 2020	Li, Chenchen	June 4, 2020
Archer, Meghan	June 4, 2020	Lien, Jana	August 14, 2020

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Ashrit, Manuraj	June 4, 2020	Lightfoot, Monica	June 4, 2020
Atluri, Sandeep	June 4, 2020	Linsay, Ernie	July 2, 2019
Badyal, Rajeev	March 19, 2020	Lisondra, DJ	June 4, 2020
Bailey, John	August 14, 2020	Liu, Jenny	June 4, 2020
Barbiere, Karen	June 4, 2020	Lomas, Jamie	March 19, 2020
Bar-Haim, Tamir	March 19, 2020	Longron, Katie	June 4, 2020
Bass, Steve	June 4, 2020	Lorenz, Eva	July 2, 2019
Battles, Matthew	March 19, 2020	Love, Nick	July 2, 2019
Beach, Leigh	June 4, 2020	Luis Chopra, Naveen	June 4, 2020
Beck, Jenna	June 4, 2020	Luthy, Dana	July 2, 2019
Belle, Jeffrey	July 2, 2019	Ma, Kristine	June 4, 2020
Bergdahl, Alex	June 4, 2020	Mackey, John	June 4, 2020
Bergey, Sarah	June 4, 2020	Madan, Udit	July 2, 2019
Bernal, Irene	June 4, 2020	Mahen, Nick	June 4, 2020
Bernard, Paul	March 19, 2020	Mansuri, Fouzan	July 2, 2019
Berry, Katelyn	June 4, 2020	Martin, Stephen	June 4, 2020
Berryhill, Stephanie	August 14, 2020	Mashruwala, Rajiv	June 4, 2020
Bertucci, Carlo	March 19, 2020	Masone, Tony	March 19, 2020
Bhatia, Deepak	July 2, 2019	Mathew, Sara	July 2, 2019
Black, Deborah	July 2, 2019	Maxfield, Daniel	March 19, 2020
Blair, Kevin	June 4, 2020	Mayward, Ryan	March 19, 2020
Blevins, Erin	June 4, 2020	Mccarroll, Dan	June 4, 2020
Boom, Steve	March 19, 2020	McCray, Timothy	June 4, 2020
Bottorff, Mandy	June 4, 2020	McDaniel, Mylinda	August 14, 2020
Brandhorst, Ellena	June 4, 2020	Meador, Ryan	June 4, 2020
Broussard, Eric	June 4, 2020	Medina, Juan	June 4, 2020
Brownlow, Wood	June 4, 2020	Mendelson, Robin	July 2, 2019
Bunch, John	July 2, 2019	Midgley, Maureen	July 2, 2019
Burkhart, Kevin	June 4, 2020	Miller, David	July 2, 2019
Calderon, Eva	June 4, 2020	Mishra, Ashutosh	June 4, 2020
Caldwell, Christy	June 4, 2020	Mitchell Hulford, Chelsea	June 4, 2020
Caleffi, Sara	July 2, 2019	Mohn, Marisa	June 4, 2020
Cantu-Paz, Erick	June 4, 2020	Moir, Dustyn	August 14, 2020
Carpenter, Gail	March 19, 2020	Monti, Daniele	June 4, 2020
Carr, Matthew	March 19, 2020	Mottolese, Giovanni	June 4, 2020
Carr, Neil	June 4, 2020	Mullinix, Betsy	June 4, 2020
Carroll, Dorion	July 2, 2019	Narayanan, Balaji	June 4, 2020
Cathey-Roberts, John	March 19, 2020	Narayanan, Kannan	June 4, 2020
Ceballos Encarnacion, Alex	March 19, 2020	Needham, Col	March 19, 2020
Chan, Kristine	March 19, 2020	Nelli, Rohit	June 4, 2020
Chauhan, Akash	July 2, 2019	Nestares, Carmen	July 2, 2019
Chempananical, Tom	June 4, 2020	Nigh, Kelly	June 4, 2020
Chereau, Marion	June 4, 2020	Nyeholt, Tanja	August 14, 2020

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Chiarella, Sharon	July 2, 2019	OConnor, Daniel	June 4, 2020
Chilukuri, Shiva	June 4, 2020	Omar, Yousri	June 4, 2020
Chin, Lesley	June 4, 2020	Park, Jae	March 19, 2020
Chopra, Naveen	March 19, 2020	Parker, TJ	July 2, 2019
Christensen, Alexandra	August 14, 2020	Patel, Hetu	June 4, 2020
Christensen, Amy	August 14, 2020	Person, Kerry	July 2, 2019
Chun, Betty	June 4, 2020	Peterson, Matt	March 19, 2020
Cohen, Alisa	June 4, 2020	Philip, Harry	June 4, 2020
Colby, Emily	August 14, 2020	Phillips, Robert	June 4, 2020
Collins, Brian	June 4, 2020	Pickthorn, Allison	June 4, 2020
Cosentino, Sarah	March 19, 2020	Pohlers, Dirk	June 4, 2020
Costello, Melissa	August 14, 2020	Popchuk, Michael	July 2, 2019
Crawford, Robin	June 4, 2020	Powell, Chuck	July 2, 2019
Craycroft, Tim	July 2, 2019	Prasad, Archit	June 4, 2020
Curan, Alexis	August 14, 2020	Prasad, Rohit	June 4, 2020
Cyran, Jeff	June 4, 2020	Prybell, Mark	July 2, 2019
Dale, Becky	June 4, 2020	Radhakrishnan, Anand	June 4, 2020
Dallaire, Seth	July 2, 2019	Ragi, Shaminder Singh	June 4, 2020
Davis, Alicia	March 19, 2020	Rahemtulla, Munira	March 19, 2020
Davis, Briana	August 14, 2020	Rajan, Arun	July 2, 2019
Dawes, Matt	June 4, 2020	Rakhimova, Kamila	June 4, 2020
Demeester, Yana	June 4, 2020	Raspberry, Celena	June 4, 2020
DePree, Alexis	July 2, 2019	Rathnam, Sukumar	July 2, 2019
Dumoulin, Benoit	June 4, 2020	Renz, Maria	July 2, 2019
Durasoff, Hannah	June 4, 2020	Reynolds, Shelley	March 19, 2020
Eamer, Mark	March 19, 2020	Rich, Hilary	June 4, 2020
Elvers, Ryan	June 4, 2020	Roberts, Carolyn	June 4, 2020
English, Amber	June 4, 2020	Rothman, Michelle	July 2, 2019
Evans, Chris	March 19, 2020	Saleeba, Ashley	June 4, 2020
Evans, Jack	June 4, 2020	Salke, Jennifer	March 19, 2020
Everett, Jason	June 4, 2020	Saranow, David	June 4, 2020
Feitzinger, Ed	July 2, 2019	Scharf, Will	June 4, 2020
Fletcher, Ian	July 2, 2019	Schneider, Karena	March 19, 2020
Fordyce, Eve	August 14, 2020	Schulte, Cynthia	June 4, 2020
Forsythe, David	July 2, 2019	Schwartz, Ian	June 4, 2020
Furlong, Matt	July 2, 2019	Shearer, David	March 19, 2020
Gandhi, Rushi	June 4, 2020	Sheehan, Kathy	June 4, 2020
Gannon, Brittney	March 19, 2020	Shure, Steven	March 19, 2020
Geil, John	June 4, 2020	Siefker, William	July 2, 2019
Giannini, Suzanne	August 14, 2020	Siminoff, Jamie	March 19, 2020
Goetsch, Adam	July 2, 2019	Sinha, Avantika	June 4, 2020
Gold, Kim	June 4, 2020	Sjostrom, Danielle	August 14, 2020

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Goldberg, Brett	June 4, 2020	Snodgrass, Molly	June 4, 2020
Gordon, Lauren	June 4, 2020	Solomon, Elizabeth	June 4, 2020
Grant, Jed	June 4, 2020	Song, Janie	July 2, 2019
Grether, Mark	March 19, 2020	Soto, Rafael	June 4, 2020
Grossman, Dan	March 19, 2020	Srinivasan, Arun	March 19, 2020
Guo, Gary	July 2, 2019	Srinivasan, Vaishnavi	July 2, 2019
Hall, Christi	August 14, 2020	Stanzel, Steve	March 19, 2020
Halladay, Tim	March 19, 2020	Stewart, Joanna	March 19, 2020
Hamel, Andrew	July 2, 2019	Stix, Jessica	June 4, 2020
Hardin, Phil	March 19, 2020	Stockman, Susan	June 4, 2020
Harner, Shelby	August 14, 2020	Straube, Lisa	June 4, 2020
Harper, Ayesha	June 4, 2020	Strauch, Mike	July 2, 2019
Hart, Nicole	August 14, 2020	Suruliz, Nedim	June 4, 2020
Harter, Nicole	June 4, 2020	Sussner, Daniel	June 4, 2020
Hawley, Ruthie	June 4, 2020	Suveyke, Shira	July 2, 2019
Heaton-Armstrong, Piers	July 2, 2019	Swanson, Eric	July 2, 2019
Herman, Wes	March 19, 2020	Swayze, Shannon	August 14, 2020
Hilal, Dina	June 4, 2020	Taneja, Veenu	July 2, 2019
Hockin, Chad	June 4, 2020	Tatman, Mara	June 4, 2020
Holby, Sara	August 14, 2020	Taubenheim, Elise	June 4, 2020
Holloway, Chris	July 2, 2019	Taylor, Dena	June 4, 2020
Hom, Kendall	June 4, 2020	Tippett, Matthew	June 4, 2020
Hsieh, Tony	July 2, 2019	Tirumale, Arun	June 4, 2020
Huey, Phyllis	June 4, 2020	Toupalik, Madeline	June 4, 2020
Hung, Hsiao Fen	August 14, 2020	Tracy, Jahn	June 4, 2020
Hurst, Carole	June 4, 2020	Treadwell, Dave	July 2, 2019
Jain, Palak	March 19, 2020	Trigg, Becky	August 14, 2020
Jedda, Dan	March 19, 2020	Tsukamoto, Shinji	March 19, 2020
Jimerson, Courtney	June 4, 2020	Tulasendrapuram, Janani	June 4, 2020
Joannides, Selena	June 4, 2020	Van der Meulen, Jorrit	March 19, 2020
Johnson, Ethan	June 4, 2020	Van Soye, Kristen	August 14, 2020
Johnson, Zach	March 19, 2020	Varadhan, Devraj	July 2, 2019
Joubert, Vincent	June 4, 2020	Vasen, Simoina	July 2, 2019
Kabbani, Nader	July 2, 2019	Vasisht, Neha	June 4, 2020
Kalsi, Ankur	June 4, 2020	Visoso, Luis	March 19, 2020
Kapoyos, Yanti	August 14, 2020	Vrubel, Maryana	June 4, 2020
Kenneway, Matt	June 4, 2020	Walowski, Joe	June 4, 2020
Kessel, Steven	July 2, 2019	Walsh-Allen, Krystal	March 19, 2020
Khera, Munny	June 4, 2020	Wang, Yunyan	July 2, 2019
Kim, Min	June 4, 2020	Watts, Zak	July 2, 2019
Kim, Roger	June 4, 2020	Whitten, Marc	March 19, 2020
Klenetsky, Jennifer	August 14, 2020	Wieder, Natalie	June 4, 2020

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Kok, Li-yin	June 4, 2020	Wiggers, Mat	March 19, 2020
Komorous, Nick	March 19, 2020	Williams, Michael	March 19, 2020
Konganda, Somana	July 2, 2019	Williams, Robert	March 19, 2020
Kuzak, Derek	June 4, 2020	Williams, Tyler	March 19, 2020
Lamp, Kurt	March 19, 2020	Williams, Vanessa	June 4, 2020
Lane, Katrina	July 2, 2019	Windham, Chris	June 4, 2020
Lange, John	March 19, 2020	Wolf, Toki	June 4, 2020
Later, Sam	August 14, 2020	Wreakes, Paul	June 4, 2020
Laughlin, Kristin	June 4, 2020	Yousuf, Rehan	June 4, 2020
Lawson, Chris	June 4, 2020	Zapolsky, David	June 4, 2020
Le Bourgeois, Nicolas	July 2, 2019	Zawojski, Emmy	August 14, 2020
Lemoine, Gaetan	June 4, 2020	Zehr, Gregg	March 19, 2020

***Spec. 7:** All steps taken by the Company to identify current and former Company employees and Investigation custodians who had previously used and/or are currently using Signal and the timing of those steps.*

Overview

As part of its compliance with the Investigation, Amazon sent formal document preservation notices and took the steps described below to identify custodians who have used Signal for work. Following this initial diligence, Amazon took additional steps for purposes of custodial collections, including those steps described below, in response to this Investigation [REDACTED] to confirm whether custodians had any existing, responsive Signal messages on their phones.

Through this process, as described in greater detail below, Amazon determined there were no existing Signal messages on any custodians' phones that were substantive and responsive to this Investigation under the parameters of the September 29, 2020 Final Production Schedule. Amazon reached this conclusion for several reasons: (1) because the vast majority of custodians did not use Signal; (2) because some custodians used Signal but not for work-related communications; (3) because some custodians used Signal for work-related communications but only for non-substantive communications or for substantive communications that were not within the scope or relevant time period of the Investigation; and (4) because some custodians had Signal message threads where the disappearing message feature was enabled by a party to that thread and Amazon cannot recover or assess the content of messages sent while the disappearing message feature was enabled. With respect to category (4), Amazon disclosed the issue to FTC staff during a call on March 4, 2022 and via correspondence of March 22, 2022 (in relation to this Investigation). Amazon also made a disclosure regarding Signal threads not retrievable [REDACTED] on February 14, 2022.

Detailed Description

In response to the notification letter sent to Amazon in June 2019 and the Civil Investigative Demand issued to Amazon in February 2020, Amazon sent formal document

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preservation notices to numerous Amazon personnel, as described in the response to Specification 6. In Summer 2020, Amazon also sent questionnaires to the Investigation custodians identified in response to Specification 6, along with legal guidance regarding Amazon's preservation obligations.² Based on custodians' responses to these questionnaires, as well as subsequent diligence on particular custodians during the collection period from Summer 2020 and Spring 2021, Amazon determined which custodians may have used Signal for work-related communications.

After identifying an Investigation custodian who may have used Signal for work-related communications, Amazon's counsel conducted additional diligence to determine whether they had any existing Signal messages on their phones responsive to the Investigation. In doing so, Amazon sought to understand the nature of Signal use for each custodian through in-person interviews and email correspondence, as described further below. Amazon reiterated its legal guidance to custodians regarding Amazon's preservation obligations during these communications. As a result of this diligence, Amazon determined there were no existing Signal messages within the scope of the Investigation, as defined by the September 29, 2020 Final Production Schedule. At that time, Amazon understood it had complied with its collection obligations under the Investigation, which did not extend beyond March 1, 2020 for sources other than email and Chime, nor to collection of sources other than internal email and Chime for Mr. Bezos, Mr. Hopkins, and Mr. Jassy. Counsel also issued legal guidance regarding Amazon's preservation obligations with respect to secure messaging apps to Amazon's S-Team, including over a dozen Investigation custodians, in October 2020. This legal guidance was subsequently re-issued to several Investigation custodians [REDACTED]

As Amazon learned more information through its diligence [REDACTED] in Summer 2021, Amazon continued its efforts to identify custodians using Signal for work-related communications. In particular, Amazon counsel conducted additional interviews and email outreach to Investigation custodians in Fall 2021 and Spring and Summer 2022.

In all, Amazon's counsel conducted follow-up interviews and email communications concerning Signal use with the following custodians, all of whom Amazon had identified as having used Signal for potentially work-related messages: Pat Bajari, Christine Beauchamp, Jeff Bezos, Jeff Blackburn, Jeff Carter, Natasha Chand, Dave Clark, Janette Coleman, John Connors, John Felton, Russ Grandinetti, David Henri, Doug Herrington, Mike Hopkins, Andy Jassy, Paul Kotas, Peter Krawiec, Stephenie Landry, Dave Limp, Neil Lindsay, Brian Olsavksy, Cem Sibay, Tom Taylor, and Jeff Wilke. On those occasions, custodians were again provided legal guidance regarding Amazon's preservation obligations. Some of these interactions also addressed the collection of Signal messages from the custodians, as described further in the response to Specification 8.

² Amazon sent questionnaires to custodians insofar as they were employees at Amazon at the time. Amazon did not receive a completed questionnaire from Mr. Blackburn, who was on sabbatical at the time, or from Mr. Hopkins, who was only subject to email and Chime refresh collections and production obligations. Amazon later received completed questionnaires from Mr. Blackburn and Mr. Hopkins in Summer 2021 [REDACTED]

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In particular:

- **Pat Bajari:** In addition to Mr. Bajari being issued the notices identified above in response to Specification 6, following review of Signal materials collected from other custodians, counsel interviewed Mr. Bajari in August 2022 and confirmed that Mr. Bajari's Signal use was not substantive or was not responsive to the Investigation.
- **Christine Beauchamp:** In addition to Ms. Beauchamp being issued the notices identified in response to Specification 6 and additional guidance—including the October 2020 S-Team guidance and reissuance of that guidance in March 2021—counsel followed up with Ms. Beauchamp via email in March 2021 and confirmed that she did not possess any substantive messages within the relevant time period that were responsive to the Investigation. Counsel also interviewed Ms. Beauchamp in January 2022 and confirmed that Ms. Beauchamp's Signal use was not substantive or was not responsive to the Investigation.
- **Jeff Bezos:** In addition to Mr. Bezos being issued the notice identified in response to Specification 6 and additional guidance—including the October 2020 S-Team guidance and additional guidance in July 2021—counsel interviewed him in February 2022 concerning his Signal usage. Amazon also collected Signal screenshots from Mr. Bezos's phone as described in response to Specification 8. These Signal screenshots did not contain responsive messages under the parameters of the September 29, 2020 Final Production Schedule.
- **Jeff Blackburn:** In addition to Mr. Blackburn being issued the notices identified in response to Specification 6, and additional guidance—including the October 2020 S-Team guidance and reissuance of that S-Team guidance in October 2021—counsel interviewed him in August 2021, December 2021, and March 2022. These interviews related, in part, to his Signal usage. Amazon also collected Signal screenshots from Mr. Blackburn's phone as described in response to Specification 8. These Signal screenshots did not contain responsive messages under the parameters of the September 29, 2020 Final Production Schedule.
- **Jeff Carter:** In addition to Mr. Carter being issued the notices identified in response to Specification 6, counsel interviewed Mr. Carter in July 2020 and April 2022 and confirmed that Mr. Carter's Signal use was not substantive or was not responsive to the Investigation.
- **Natasha Chand:** In addition to Ms. Chand being issued the notices identified in response to Specification 6, counsel followed up with Ms. Chand via email and interviewed her in January 2021 and confirmed that Ms. Chand's Signal use was not substantive or was not responsive to the Investigation. Ms. Chand left Amazon in December 2021 and is not presently employed by the Company.
- **Dave Clark:** In addition to Mr. Clark being issued the notices identified in response to Specification 6 and additional guidance—including the October 2020 S-Team guidance

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and reissuance of that guidance in November 2020—counsel followed up with Mr. Clark via email in November 2020 and confirmed that he did not possess any substantive messages within the relevant time period that were responsive to the Investigation. Counsel again interviewed Mr. Clark in November 2021. Amazon also collected Signal screenshots from Mr. Clark’s phone as described in response to Specification 8. These Signal screenshots did not contain responsive messages under the parameters of the September 29, 2020 Final Production Schedule. Mr. Clark left Amazon in July 2022 and is not presently employed by the Company.

- **Janette Coleman:** In addition to Ms. Coleman being issued the notices identified in response to Specification 6, counsel followed up with Ms. Coleman via email in November 2020 and confirmed that she did not possess any substantive messages within the relevant time period that were responsive to the Investigation. Counsel also interviewed Ms. Coleman in November 2021 and April 2022 and confirmed that Ms. Coleman’s Signal use was not substantive or was not responsive to the Investigation. Ms. Coleman left Amazon in July 2022, and is not presently employed by the Company.
- **John Connors:** In addition to Mr. Connors being issued the notices identified in response to Specification 6, counsel followed up with Mr. Connors via email in July 2020 and December 2020 and confirmed that his Signal use was not substantive or was not responsive to the Investigation. Counsel interviewed Mr. Connors in April 2022 and again confirmed that his Signal use was not responsive to the Investigation.
- **John Felton:** In addition to Mr. Felton being issued the notices identified in response to Specification 6 and additional guidance—including the October 2020 S-Team guidance—counsel interviewed Mr. Felton in July 2020 and April 2022 and confirmed that Mr. Felton’s Signal use was not substantive or was not responsive to the Investigation.
- **Russ Grandinetti:** In addition to Mr. Grandinetti being issued the notices identified in response to Specification 6 and additional guidance—including the October 2020 S-Team guidance—counsel followed up with Mr. Grandinetti in November 2020 and confirmed that he did not possess any substantive messages within the relevant time period that were responsive to the Investigation. Counsel interviewed Mr. Grandinetti in November 2021 and confirmed that Mr. Grandinetti’s Signal use was not substantive or was not responsive to the Investigation.
- **David Henri:** In addition to Mr. Henri being issued the notices identified in response to Specification 6, counsel followed up with Mr. Henri via email in December 2020 and confirmed that he did not possess any substantive messages within the relevant time period that were responsive to the Investigation. Mr. Henri left Amazon in 2021, and is not presently employed by the Company.
- **Doug Herrington:** In addition to Mr. Herrington being issued the notices identified in response to Specification 6 and additional guidance—including the October 2020 S-Team guidance and reissuance of that S-Team guidance in November 2020—counsel followed up with Mr. Herrington via email in November 2020 and interviewed him in March 2022,

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and confirmed that Mr. Herrington's Signal use was not substantive or was not responsive to the Investigation.

- **Mike Hopkins:** In addition to Mr. Hopkins being issued the notices identified in response to Specification 6 and additional guidance—including the October 2020 S-Team guidance—after review of Mr. Hopkins's questionnaire responses [REDACTED], counsel conducted interviews with Mr. Hopkins in August 2021 and February 2022 concerning his Signal usage. Amazon also collected Signal screenshots from Mr. Hopkins's phone as described in response to Specification 8. These Signal screenshots did not contain responsive messages under the parameters of the September 29, 2020 Final Production Schedule.
- **Andy Jassy:** In addition to Mr. Jassy being issued the notice identified in response to Specification 6 and additional guidance—including the October 2020 S-Team guidance and additional guidance in July 2021, December 2021 and February 2022—counsel interviewed Mr. Jassy in February 2022 concerning his Signal usage. Amazon also collected Signal screenshots from Mr. Jassy's phone as described in response to Specification 8. These Signal screenshots did not contain responsive messages under the parameters of the September 29, 2020 Final Production Schedule.
- **Paul Kotas:** In addition to Mr. Kotas being issued the notices identified in response to Specification 6 and additional guidance—including the October 2020 S-Team guidance—counsel followed up with Mr. Kotas in December 2020 and determined that he did not possess any substantive messages within the relevant time period that were responsive to the Investigation. Counsel interviewed Mr. Kotas in April 2022 and confirmed that Mr. Kotas's Signal use was not substantive or was not responsive to the Investigation.
- **Peter Krawiec:** In addition to Mr. Krawiec being issued the notices identified in response to Specification 6 and additional guidance—including the October 2020 S-Team guidance and reissuance of that S-Team guidance in January 2021 and February 2021—counsel interviewed Mr. Krawiec in February 2021, November 2021, February 2022, and May 2022. These interviews related, in part, to his Signal usage. Amazon also collected Signal screenshots from Mr. Krawiec's phone as described in response to Specification 8. These Signal screenshots did not contain responsive messages under the parameters of the September 29, 2020 Final Production Schedule.
- **Stephenie Landry:** In addition to Ms. Landry being issued the notices identified in response to Specification 6, counsel conducted an interview with Ms. Landry in July 2020 and concluded that Ms. Landry did not use Signal for work-related communications during the relevant time period. Counsel interviewed Ms. Landry again in November 2021 and April 2022 and confirmed that Ms. Landry's Signal use was not substantive or was not responsive to the Investigation.
- **Dave Limp:** In addition to Mr. Limp being issued the notices identified in response to Specification 6 and additional guidance—including the October 2020 S-Team guidance—counsel interviewed Mr. Limp in December 2020 and November 2021, and confirmed that

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he did not possess any substantive messages within the relevant time period that were responsive to the Investigation.

- **Neil Lindsay:** In addition to Mr. Lindsay being issued the notices identified in response to Specification 6 and additional guidance—including the October 2020 S-Team guidance and reissuance of that S-Team guidance in February 2021—counsel followed up with Mr. Lindsay via email in February 2021 and confirmed that Mr. Lindsay’s Signal use was not substantive or was not responsive to the Investigation. Counsel interviewed Mr. Lindsay in May 2022 and again confirmed that his Signal use was not substantive or was not responsive to the Investigation.
- **Brian Olsavksy:** In addition to Mr. Olsavsky being issued the notices identified in response to Specification 6 and additional guidance—including the October 2020 S-Team guidance and reissuance of that S-Team guidance in November 2020—counsel followed up with Mr. Olsavsky via email in November 2020 and confirmed that his Signal use was not substantive or was not responsive to the Investigation. Counsel interviewed Mr. Olsavsky in April 2022 and again confirmed that his Signal use was not substantive or was not responsive to the Investigation.
- **Cem Sibay:** In addition to Mr. Sibay being issued the notices identified in response to Specification 6, after review of Signal materials collected from other custodians, counsel conducted follow up interviews with Mr. Sibay in May 2022 and confirmed that Mr. Sibay’s Signal use was not substantive or was not responsive to the Investigation.
- **Tom Taylor:** In addition to Mr. Taylor being issued the notices identified in response to Specification 6 and additional guidance—including the October 2020 S-Team guidance—counsel interviewed Mr. Taylor in April 2022 and confirmed that Mr. Taylor’s Signal use was not substantive or was not responsive to the Investigation.
- **Jeff Wilke:** In addition to Mr. Wilke being issued the notices identified in response to Specification 6 and additional guidance—including the October 2020 S-Team guidance and reissuance of that S-Team guidance in December 2020—counsel followed up with Mr. Wilke via email in December 2020 and interviewed him in March 2022 and confirmed that he did not possess any substantive messages within the relevant time period that were responsive to the Investigation. Mr. Wilke left Amazon in March 2021 and is not presently employed by the Company.

Spec. 8: All steps taken by the Company to collect and preserve current and former Company employee Signal messages and threads in connection with the Investigation and the timing of those steps, including, but not limited to:

- (a) collecting physical phones, tablets, and computers;
- (b) taking screenshots of Signal messages and threads;
- (c) collecting screenshots of Signal messages and threads;

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- (d) collecting Signal log-in information;
- (e) collecting metadata relating to Signal messages and threads, including deleted and disappearing messages;
- (f) imaging of physical phones, tablets, and computers; and
- (g) retaining physical phones, tablets, and computers previously used for Signal that are no longer in use.

As part of its diligence on Signal, described above in the response to Specification 7, Amazon took steps to collect potentially responsive Signal messages.

As explained in Amazon's prior correspondence, due to Signal's method of encryption, Amazon and its eDiscovery vendor Consilio have not identified a reliable way to collect native data from Signal that preserves and exports all metadata. As a result, Signal messages have been collected through a manual process that involves taking screenshots of messages on the custodians' personal cell phones.

As discussed in the response to Specification 7, Amazon did not identify any substantive Signal messages that were responsive under the parameters of the September 29, 2020 Final Production Schedule. In connection with [REDACTED] Mr. Clark's departure, Amazon collected all existing, work-related Signal threads for six Investigation custodians, as described in the chart below.³

Table 3	
Custodian	Signal Collection Dates
Bezos, Jeff	January 7, 2022 and May 14, 2022
Blackburn, Jeff	November 17, 2021 and January 18, 2022
Clark, Dave	July 25, 2022
Hopkins, Mike	October 20, 2021 and January 3, 2022
Jassy, Andy	January 5, 2022
Krawiec, Peter	November 15, 2021

Amazon collected forensic images of phones and reviewed text messages from the following custodians in connection with this Investigation, once Amazon learned these custodians may have used texts on their personal phones for potentially responsive communications. Similarly, Amazon collected and imaged phones for this reason for four Investigation custodians [REDACTED], as denoted by asterisks in the table below. As described above, these images did not capture Signal messages due to Signal's method of encryption.

Table 4	
Custodian	Image Date

³ [REDACTED], Amazon also collected all existing, work-related Signal threads for Jennifer Salke on November 22, 2021 and February 5, 2022 and for Jay Marine on November 10, 2021 and January 6, 2022.

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Baker, Adam	January 25, 2021
Bangs, Jon	October 28, 2020
Berns, Adam	April 5, 2021
Blackburn, Jeff	August 25, 2021*
Blackburn, Jeff	January 18, 2022*
Chand, Natasha	January 19, 2021
Collins, Tim	February 9, 2021
Downer, Steve	January 11, 2021
Fincham, Tim	February 25, 2021
Gao, Wei	June 25, 2021
Hopkins, Mike	September 17, 2021*
Hopkins, Mike	January 8, 2022*
Jassy, Andy	January 5, 2022* ⁴
Krawiec, Peter	March 10, 2021
Krawiec, Peter	September 13, 2021*
Landry, Stephenie	July 1, 2021
Limp, Dave	January 19, 2021
Pulciani, Rob	May 14, 2021
Stites, Robert	July 22, 2021

Amazon also collected text messages through screenshots from Mr. Bezos's phone on January 7, 2022 and May 14, 2022, and from Mr. Clark's phone on July 25, 2022.

In addition, Amazon collected and obtained forensic images of company-issued laptops for all Investigation custodians who were employed at Amazon during Summer 2020. Laptops were imaged either by in-person collection or through a remote imaging process. Eight of these custodians also had their company-issued laptops imaged in Summer 2021 [REDACTED], denoted by an asterisk. The dates and methods of laptop imaging are listed below. These laptops were imaged as part of the general document collection processes for this Investigation [REDACTED], not as part of an effort to collect Signal messages.

Table 5		
Custodian	Image Date	Image Method
Agostini, Adrian	April 26, 2022	In-Person
Anbalagan, Karthik	July 21, 2020	Remote
Atkins, Brian	July 9, 2020	Remote
Aubrey, Colleen	July 2, 2020	In-Person
Bajari, Pat	July 24, 2020	In-Person
Baker, Adam	July 17, 2020	Remote
Bangs, Jon	July 30, 2020	Remote
Beauchamp, Christine	July 23, 2020	Remote
Beauchamp, Christine	September 3, 2021*	Remote

⁴ Mr. Jassy had two phones, a Blackberry and an iPhone, both of which were imaged on January 5, 2022.

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Bennett, Lindell Lee	July 1, 2020	In-Person
Berns, Adam	July 9, 2020	Remote
Blackburn, Jeff	October 9, 2019	In-Person
Blackburn, Jeff	October 9, 2019	In-Person
Blackburn, Jeff	October 9, 2019	In-Person
Blackburn, Jeff	October 9, 2019	In-Person
Blackburn, Jeff	October 9, 2019	In-Person
Blackburn, Jeff	August 20, 2021*	In-Person
Bozeman, David	July 27, 2020	Remote
Cardadeiro, David	July 14, 2020	Remote
Carter, Jeff	July 1, 2020	Remote
Chand, Natasha	July 2, 2020	In-Person
Chew, Chee	April 26, 2022	In-Person
Chopra, Rajiv	July 1, 2020	In-Person
Chopra, Rajiv	June 26, 2020	In-Person
Clark, Dave	July 28, 2020	Remote
Coleman, Janette	July 29, 2020	Remote
Collins, Timothy	July 15, 2020	In-Person
Collins, Timothy	July 15, 2020	In-Person
Copeland, Pat	July 21, 2020	Remote
Cravalho, Nick	July 13, 2020	Remote
Daniel, Miriam	July 11, 2020	Remote
Delingat, Marc	July 1, 2020	Remote
Denissen, Nicholas	July 1, 2020	Remote
Despins, Paula	July 2, 2020	Remote
Downer, Steve	October 29, 2019	Unknown
Downer, Steve	July 13, 2020	Remote
Eamer, Melissa	April 26, 2022	In-Person
Elton, Tanner	July 2, 2020	Remote
Faricy, Peter	April 25, 2022	In-Person
Farrell, Corey	July 8, 2020	Remote
Felton, John	July 15, 2020	In-Person
Fincham, Tim	July 22, 2020	In-Person
French, Eric	July 20, 2020	Remote
Fresko, Nedim	July 8, 2020	Remote
Gansert, Rebecca	July 21, 2020	Remote
Gao, Wei	July 30, 2020	Remote
Garg, Neeraj	July 30, 2020	Remote
Garg, Neeraj	July 30, 2020	Remote
George, Dave	June 29, 2020	Remote
Ghani, Jamil	July 31, 2020	Remote
Ghani, Jamil	August 24, 2021*	Remote
Glenn, Christa	July 1, 2020	In-Person
Grandinetti, Russ	October 16, 2019	In-Person
Grandinetti, Russ	July 24, 2020	In-Person

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Greeley, Greg	April 26, 2022	In-Person
Griffith, Mark	July 16, 2020	In-Person
Gunningham, Sebastian	April 26, 2022	In-Person
Gupta, Srishti	July 9, 2020	Remote
Helbling, Jeff	July 21, 2020	Remote
Henri, David	July 28, 2020	In-Person
Herrington, Doug	July 21, 2020	Remote
Heyworth, Sam	July 1, 2020	In-Person
Hopkins, Mike	August 25, 2021*	Remote
Indresano, Mike	April 26, 2022	In-Person
Jain, Ravi	July 22, 2020	In-Person
Jain, Ravi	July 24, 2020	In-Person
Jain, Sachin	June 25, 2020	In-Person
Jain, Sunny	April 26, 2022	In-Person
Keith, Kevin	July 16, 2020	Remote
Kirk, Jon	July 17, 2020	In-Person
Kniesel, Danica	July 24, 2020	In-Person
Kotas, Paul	August 3, 2020	In-Person
Krawiec, Peter	August 5, 2020	In-Person
Krawiec, Peter	September 1, 2021*	In-Person
Landry, Stephenie	February 19, 2020	Unknown
Landry, Stephenie	July 16, 2020	In-Person
Lane, David	July 16, 2020	In-Person
Larsen, Peter	July 15, 2020	In-Person
Levanon, Nurit	July 24, 2020	Remote
Limp, Dave	August 14, 2020	In-Person
Limp, Dave	October 7, 2019	In-Person
Lindsay, Neil	July 31, 2020	Remote
Lindsay, Neil	August 20, 2021*	Remote
Lindsay, Neil	August 23, 2021*	Remote
Livesay, David	July 17, 2020	In-Person
Love, John	July 10, 2020	Remote
Mason, Llew	July 20, 2020	Remote
Mason, Llew	August 19, 2021*	Remote
Mathieson, Mike	April 26, 2022	In-Person
McGinness, Tralee	July 27, 2020	In-Person
McGinness, Tralee	July 27, 2020	In-Person
McGuire, Laurie	August 19, 2020	In-Person
Mehta, Dharmesh	June 24, 2020	Remote
Mishra, Devesh	July 15, 2020	Remote
Moore, Chuck	July 26, 2020	Remote
Muthukrishnan, Muthu	July 1, 2020	Remote
Naggar, David	July 15, 2020	Remote
Naggar, David	August 30, 2019	Remote
Nahon, Jean-Luc	July 1, 2020	In-Person

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Nidamarthi, Lakshmi	July 22, 2020	In-Person
Olsavsky, Brian	July 31, 2020	In-Person
Olsavsky, Brian	December 9, 2021*	In-Person
Orvidas, Laura C	April 26, 2022	In-Person
Pang, Jimmy	April 26, 2022	In-Person
Pape, Craig	July 14, 2020	Remote
Patrick, Piper	August 3, 2020	Remote
Perez-Tenessa, Alex	July 15, 2020	Remote
Phillips, Robert	June 30, 2020	Remote
Pinkerton, Brian	April 26, 2022	In-Person
Pulciani, Rob	July 14, 2020	Remote
Rabuchin, Steve	July 15, 2020	In-Person
Ronen, Assaf	April 26, 2022	In-Person
Roth, Mike	April 26, 2022	In-Person
Rupp, Christine	April 26, 2022	In-Person
Salomon, Shelley	July 24, 2020	In-Person
Santana-Alvarez, Barbara	July 24, 2020	In-Person
Seth, Pooja	July 20, 2020	Remote
Shure, Steven	August 25, 2020	In-Person
Sibay, Cem	July 24, 2020	Remote
Signorelli, Sharon	July 24, 2020	In-Person
Simpson, Ian	July 8, 2020	Remote
Spoonemore, Brenda	July 24, 2020	Remote
Spoonemore, Brenda	October 21, 2019	In-Person
St. Angel, Lindo	June 17, 2020	Remote
Stites, Robert	July 31, 2020	Remote
Taddy, Matt	July 2, 2020	In-Person
Taylor, Tom	August 13, 2020	In-Person
Thirumalai, Srikanth	August 3, 2020	Remote
Tundrea, Emanuela	September 9, 2020	In-Person
Valdez, Arthur	May 5, 2022	In-Person
Weiland, Tom	July 17, 2020	Remote
Weldele, Tobin	July 20, 2020	Remote
Wilke, Jeff	July 28, 2020	In-Person
Wilke, Jeff	July 28, 2020	In-Person
Wilke, Jeff	July 28, 2020	In-Person
Wilke, Jeff	May 5, 2021	In-Person
Williams, Cynthia	April 26, 2022	In-Person
Williams, Lisa	August 14, 2020	In-Person
Williams, Robert	July 9, 2020	Remote
Witham, Jon	July 7, 2020	Remote
Wood, Sarah	July 17, 2020	Remote
Yurcisin, Jeff	April 26, 2022	In-Person
Zimmer, Dave	July 16, 2020	Remote

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Amazon did not identify any tablets used for Signal or containing otherwise unique responsive documents for this Investigation.

In an effort to ensure preservation of any personal phones, tablets, or computers that may have previously been used for responsive communications and are no longer in use, Amazon issued legal document preservation notices to all Investigation custodians regarding Amazon's preservation obligations under the Investigation (see response to Specification 6). Those custodians identified as having used Signal for work-related communications were also issued additional guidance as described in response to Specification 7. Amazon also took proactive steps to retain information from phones that custodians no longer used. Specifically, when Amazon Web Services ("AWS") Security replaced Mr. Blackburn's and Mr. Jassy's phones in 2022, their old devices were retained. AWS also transferred all Signal messages from their old phones to these custodians' new devices.

The Red Brass team, an IT service for members of Amazon's S-Team, has also assisted with replacement of custodians' phones to ensure that Signal messages were preserved as custodians upgraded personal phones. Red Brass's practice is to perform device-to-device transfers to preserve all data, including any Signal data. Red Brass also assisted with "iCloud restores" for Mr. Jassy, Mr. Blackburn, and Mr. Hopkins onto new phones.

Mr. Bezos's staff has handled his phone upgrades since 2010. Their practice is to migrate communications, including Signal messages, from his old phone every time he gets a new phone.

Amazon did not collect Signal log-in information—or any other personal log-in information on private devices and apps—for any custodians, out of concern for privacy and because doing so is beyond the scope of reasonable company preservation and collection efforts.

***Spec. 9:** The make and model of each phone, tablet, and computer used for Signal by each investigation custodian.*

Amazon does not in the ordinary course of business maintain information regarding the make and model of employees' personal devices. In addition, over the course of the last few years, several custodians have switched to new phones in the normal course. Amazon identified the below information for the following custodians who used Signal in connection with imaging their phones or collecting Signal screenshots from their phones.

Table 6	
Custodian	Phone
Bezos, Jeff	iPhone 13 Pro Max
Blackburn, Jeff	iPhone 12 Pro Max
Chand, Natasha	iPhone XS
Clark, Dave	iPhone 13 Pro
Hopkins, Mike	iPhone 11 Pro Max
Jassy, Andy	Blackberry Key 2 and iPhone XR
Krawiec, Peter	iPhone 8
Landry, Stephenie	iPhone 12 Pro Max
Limp, Dave	iPhone 11